

APPENDIX 1

SUMMARY OF RULEMAKING OPTIONS TO ADDRESS WORKER FATIGUE

Summary of Rulemaking Options to Address Worker Fatigue

		Staff Options		
General Requirement	Option 1: Implement proposals of PRM-26-2.	Option 2: Amend Part 26 to establish thresholds for work hour controls and risk-informed deviation process. Amend Part 26 and RG 1.134 to address fatigue from other causes through existing licensee programs.	Option 3: Amend Part 26 to establish work hour controls.	Option 4: Amend Part 26 to require licensees to assess and manage risk associated with schedules and conditions that cause fatigue and impaired alertness. Amend Part 26 and RG 1.134 to address fatigue from other causes through existing licensee programs.
Work hour limits	Prescriptive, addresses cumulative fatigue, limits vary by type of worker and plant status.	Set thresholds based on modification of current policy guidelines to address technical and enforcement issues.	Same as Option 2	None. Licensees determine appropriate risk management actions based on assessment of schedules using a fatigue metric in conjunction with an assessment of worker tasks, conditions, and responsibilities.
Exceptions to limits	Available for pre-defined plant conditions including activation of the emergency plan, shutdown for severe weather, plant transients, major engineered safety feature actuations, and extended shutdowns.	Individual above work hour threshold is assumed impaired. Exception requires licensee finding of no undue risk considering tasks to be performed, sensitivity of tasks to fatigue effects on performance, and ability to mitigate.	Option 3a: Same as Option 2	Not applicable. However, assessments of schedules and conditions causing fatigue and impaired alertness must encompass the actual schedules and conditions. Unscheduled overtime could require an assessment of the specific conditions if not bounded by prior assessments.
			Option 3b: Exceptions only for pre-defined plant conditions as proposed in Option 1.	
Assessment and Corrective Action	Assessment of fatigue required for certain conditions and events occurring while exception invoked.	Exceeding exception threshold requires corrective action. Assessment of fatigue concurrent with for-cause FFD tests.	Option 3a: Exceeding exception threshold requires corrective action.	Licensee monitors effectiveness in limiting and managing risks of fatigue and impaired alertness. Assessment of fatigue concurrent with for-cause FFD tests.
			Option 3b: None	
Methods to Address Other Sources of Fatigue	Training for mitigation of and monitoring for fatigue. Sleep disorder screening.	Training for mitigation of and monitoring for fatigue. Sleep disorder screening.	None	Training for mitigation of and monitoring for fatigue. Sleep disorder screening.